

## REMARKS

### Rejections Under 35 U.S.C. 112

In Response to the rejection of claim 56 based on insufficient antecedent basis for the recitation of "said device" at line 2 of the claim, this claim is amended as shown above to replace "said device" with "an interactive device". This amendment is believed to overcome the 112 rejection.

### Rejections Under 35 U.S.C. 102

The Office Action rejects claim 40-89 as being anticipated by U.S. Patent No. 5,884,032 of Bateman.

Claim 40, as amended, recites a method of establishing a communications call that includes selecting a B party using a interactive device connected to a public network. In response to this selection, called address data for the B party is accessed from a *public directory* of the public network, and the called address for the B party and calling address data for an A party are sent to a communication module of the public network. A call is then established between the A and B parties over the public network by employing the connection module and the called and calling address data.

Bateman is directed to methods and systems for automatically providing a telephone connection between a customer utilizing an organization's multimedia services to the organization's Automatic Call Distribution (ACD) agent. In a typical session, a customer utilizes a browser to access a web server of the organization to view HTML pages containing information regarding the organization's products and services. The customer can choose a "Live Help" option provided within a viewed HTML page to prompt a HTML form to pop up. The pop-up HTML form asks the customer for a telephone number at which the customer can be reached. Further, the URL of the page that the customer was viewing is automatically entered in

the form. The customer's calling information is sent to a HOTLIST database that feeds an outbound dialing system. The agent can view the HTML page associated with the customer's URL before or while a call is automatically made to connect the agent to the customer.

In Bateman, even if one considers the agent to be a B party, there is no teaching or suggestion that the address data of the agent is accessed via a public directory of a public network so as to enable establishing a call between the agent and the customer. Further, in Bateman, the agent does not access the customer's address data via a public directory for establishing a call with the customer. Rather, the customer provides its own telephone number by filling the pop-up form that appears in response to selection of the "Live Help" option by the customer. In fact, neither party's address data is accessed via a public directory.

In other words, Bateman does not teach a method that allows establishing a call between two parties, upon selection of at least one party via an interactive device, by employing a public directory that includes address data of at least one of the parties. For example, in Bateman, the selection of the "Live Help" option by the customer does not allow the customer to establish connection with any party so long as that party's address data is accessible via a public directory. Rather, the selection of the "Live Help" simply routes the customer to an agent of the organization.

Accordingly, Bateman does not teach the subject matter of claim 40, and its concomitant advantages.

Independent claim 41 recites a method of establishing a communications call that includes a step of selecting a B party by using an interactive device connected to a public network, and searching for called address data for the B party by employing the interactive device and a search module of the public network, and a database of the public network that includes the called address data. The called address data of the B party and calling address data of an A party are then sent to a connection module of the public network, and a call is established

between the A and B parties over the public network by utilizing the connection module and the called and calling address data.

In Bateman, neither the address data of the agent nor that of the customer is obtained by searching database of a public network. Hence, similar to claim 40, claim 41 distinguishes patentably over Bateman as well.

The arguments presented above apply with equal force to establish that independent method claims 45, 46, and independent system claims 60 and 61, and claims dependent on these claims, are also patentable.

Independent claim 50 is directed to an interface of an interactive device for originating a communications call that includes a display controller for causing display of at least one B party, a selector for enabling a B party to be selected on the display, and a link that sends, upon activation, selected party data corresponding to the B party to a public network. The public network accesses called address data of the B party in *a public directory* on the basis of the selected party data and forwards the called address data to a connection module of the public network to establish a call with the B party.

As discussed above, Bateman does not teach or suggest accessing the address data of the B party in a public directory, as recited in claim 50. Hence, claim 50 distinguishes patentably over Bateman.

Further, the same reasoning establishes that independent claims 51, 56, 57, which are also directed to interfaces stored on an interactive system, are also patentable over Bateman.

Independent claim 69 recites a directory server for use in establishing a communications call on at least one public network. The server includes a directory database module for accessing public directory data that includes communications address data of parties connected to at least one public network, and a call connection module that can access, for the interactive

device, directory data by employing the directory database module. The server further includes a call completion module for receiving selected party data for a B party from the interactive device and transmitting a connect message to a communication module of the public network for establishing the call. The connect message includes communications address data for the B party obtained by utilizing the directory database module.

The cited Bateman patent does not provide a directory server that includes a directory database module for accessing public directory data, and a call connection module that employs the database module to access the public directory data and transmit that data to an interactive device of a user.

Hence, claim 69 distinguishes patentably over Bateman. A similar reasoning establishes that independent claim 70 is also patentable over Bateman.

Moreover, the arguments presented above apply with equal force to establish that independent claims 73, 77, 79, 88 and 89 are also patentable over the cited reference.

### **Conclusion**

In view of the above amendments and remarks, Applicants respectfully requests reconsideration and allowance of the application. The Examiner is invited to call the undersigned at (617) 439-2514 if there are any remaining issues.

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Respectfully submitted,

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